

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURG DIVISION**

In re:

Cathleen Marguerette Harbaugh,

Case No. 23-21659-JCM

Debtor.

Chapter 13

_____ /

MOTION TO REINSTATE CASE

Debtor, by and through the undersigned counsel, pursuant to Fed. R. Bankr. P. 9024 and Fed. R. Bankr. P. 5010 and Fed. R. Civ. P. 60(b)(6) and Local Rule Rule 1017-2, hereby files this *Motion to Reinstate Case*. In support thereof, Debtor states as follows:

1. On August 7, 2023, Debtor filed a voluntary petition for relief under Chapter 7 of the U.S. Bankruptcy Code.
2. On August 22, 2023, the Court issued an *Order Dismissing Case For Failure to Timely File Schedules*. [Doc. No. 17] (the “Order”), effective 15 days from the entry thereof.
3. This Motion was filed prior to the effective date of the Order.
4. Admittedly, Debtor failed to timely file the schedules.
5. Debtor understands the importance of complying with the orders of this Court and the schedules will be filed contemporaneously with this Motion.
6. This case has not been previously dismissed and reinstated.

WHEREFORE, Debtor respectfully requests that this Honorable Court enter an order vacating the dismissal, reinstating this case, and for any additional relief deemed fair and just.

Dated: September 5, 2023

Respectfully Submitted,

CONSUMER LAW ATTORNEYS

/s/ Amy Lynn Bennecoff Ginsburg
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on or before September 5, 2023, a true and correct copy of the foregoing was furnished via electronic or regular mail to the parties listed on the attached mailing matrix.

CONSUMER LAW ATTORNEYS

/s/ Amy Lynn Bennecoff Ginsburg
Amy Lynn Bennecoff Ginsburg, Esq.
Attorney for Debtor

Label Matrix for local noticing

0315-2

Case 23-21659-JCM

WESTERN DISTRICT OF PENNSYLVANIA

Pittsburgh

Tue Sep 5 23:37:23 EDT 2023

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U.S. Bankruptcy Court

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Bk Of Amer

P O Box 982236

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)AMERIHOM MORTGAGE COMPANY, LLC

End of Label Matrix

Mailable recipients 13

Bypassed recipients 1

Total 14